

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
AND MOTION FOR LATE ACCEPTANCE
(OCA/USPS-T32-109 THROUGH 115)**

The United States Postal Service hereby files its responses to the following *interrogatories of the Office of the Consumer Advocate, dated September 5, 1997:* OCA/USPS-T32-109 through 115. These interrogatories have been redirected from witness Fronk to the Postal Service for response. Each interrogatory is stated verbatim and is followed by the response. The responses were due to have been filed on Friday, September 19, 1997. The questions covered a range of topics beyond the expertise of the testimony of the witness to whom the questions were directed. It was necessary to redirect the questions to various components of postal management in order to gather responsive information. The coordination and review of the responses could not be completed in time to meet the printing deadline for a timely filing last Friday. Accordingly, the responses are being filed today, one working day late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
September 22, 1997

RESPONSE OF U.S. POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE
OF THE CONSUMER ADVOCATE REDIRECTED FROM WITNESS FRONK

OCA/USPS-T32-109. Does the Postal Service currently provide some headquarters employees who address outgoing envelopes the equipment or software to produce single-piece barcodes? If not, please explain why not. If so, please specify the brand, model number and types of printers used to print the outgoing mail envelopes.

RESPONSE: Yes. Printers are generally Hewlett Packard laser jet printers, models 3si, 4si, and 5si. The Postal Service does not have records regarding the accuracy or readability of these barcodes.

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OCA/USPS-T32-110. Does the Postal Service currently provide some non-headquarters employees who address outgoing envelopes the equipment or software to produce single-piece barcodes? If not, please explain why not. If so, please specify the brand, model number and types of printers used to print the outgoing mail envelopes.

RESPONSE: Yes. The purchase of non-headquarters printers is decentralized, but these printers are generally laser.

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OCA/USPS-T32-111. Witness Moden's redirected response to OCA/USPS-T32-51 indicates that "[g]enerally, courtesy reply envelopes meet the automation compatibility requirements . . ." Do the reply envelopes of mailers who supply courtesy reply envelopes and take automation discounts meet automation compatibility requirements? If not, please explain why the reply envelopes do not meet automation compatibility requirements, the volume that does not meet the requirements and what specific steps are taken to ensure future compliance.

RESPONSE: Reply envelopes enclosed in mailings claimed at automation rates must meet automation compatibility standards. All bulk mailings submitted at automation rates are verified to ensure that all enclosures meet all applicable mailing standards. Pieces claimed at automation rates that contain reply envelopes that do not meet automation standards may not claim automation rates unless specifically granted an exception by the Postal Service. These exceptions are granted in a limited number of cases and then only if the mailer meets specific guidelines which do not result in additional handling costs or a loss of revenue to the Postal Service.

The noncompliance must be minimal and the mailer must provide documentation to support the number of pieces affected, the time period in which the pieces will be deposited into the mailstream, and show that the mailing affects a limited delivery area.

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OCA/USPS-T32-112. In Docket R97-1, what is the Postal Service's cost estimate for educating the public on the proposed \$0.01 rate increase for the First-Class letter rate? If no estimate has been prepared, please explain and describe the efforts the Postal Service plans to take to educate the public on the proposed \$0.01 rate increase for the First-Class letter rate.

RESPONSE: Please see response to OCA/USPS-T32-50.

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OCA/USPS-T32-113. In Docket R97-1, what is the Postal Service's cost estimate for preventing household and public confusion concerning the proposed no change in the First-Class additional ounce rate? If no estimate has been prepared, please explain and describe the efforts the Postal Service plans to take to educate the public on the proposed no change in the First-Class additional ounce rate.

RESPONSE: The Postal Service does not anticipate that the public will be confused if the rate does not change. Also, please see response to OCA/USPS-T32-50.

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OCA/USPS-T32-114. Do Postal Service delivery employees ever leave short-paid mail in the residential mailbox of the addressee with a request to pay the postage due? If so, please indicate by fiscal year (FY 95 and FY 96) the amount of First-Class letter postage due that residential delivery clients failed to reimburse the Postal Service for. If you are unable to provide the information requested, please explain.

RESPONSE: Carriers do, on occasion, leave short-paid mail in the residential mailbox of the addressee with a request that the customer pay the postage due. However, this is not the Postal Service's policy. Carriers should sign acceptance of accountability for postage due items each day, and are expected to return either the required postage or the short-paid items at the end of the workday irrespective of whether customers have paid for the item. Thus, the Postal Service maintains no record of the extent to which carriers "prepay" customers' postage due, and no record of the amount of unpaid postage that results.

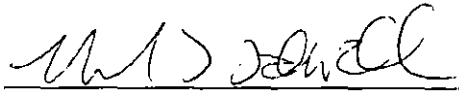
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OCA/USPS-T32-115. The following refers to your response to OCA/USPS-T32-21. Please explain why the Postal Service has not had a need to collect data on the volume of pre-paid pre-addressed envelopes that have been inappropriately entered into the Postal Service's mail stream by patrons who have altered the pre-printed address and used the envelope for purposes other than its original intent. Is the lack of information on the part of the Postal Service due to low or non-existent volume of such altered envelopes? If not, please explain.

RESPONSE: OCA/USPS-T32-21 asked about the inappropriate use of a particular Business Reply Mail piece shown in the attachment to that interrogatory. The Postal Service has not had a need to collect such data on a mailpiece by mailpiece basis.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
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September 22, 1997